

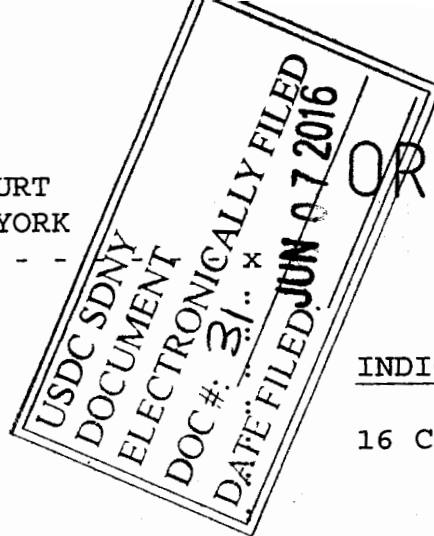
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JULIO ALVAREZ,
CHRISTOPHER CAMPOS, and
GEURIS RAMOS,

Defendants.



ORIGINAL

JUDGE TORRES

INDICTMENT

16 Cr. _____

JUDGE TORRES

16 CRIM 395

COUNT ONE

(Conspiracy to Commit Wire and Bank Fraud)

The Grand Jury charges:

1. From in or about October 2012 up to and including in or about September 2013, in the Southern District of New York and elsewhere, JULIO ALVAREZ, CHRISTOPHER CAMPOS and GEURIS RAMOS, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343, and bank fraud, in violation of Title 18, United States Code, Section 1344, to wit, ALVAREZ, CAMPOS and RAMOS conspired to submit fraudulent applications for loans to financial institutions, including banks insured by the Federal Deposit Insurance Corporation, in connection with automobile purchases by individuals ALVAREZ, CAMPOS and RAMOS knew to be straw buyers of the automobiles.

2. It was a part and an object of the conspiracy that JULIO ALVAREZ, CHRISTOPHER CAMPOS and GEURIS RAMOS, the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire and radio communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

3. It was a further part and object of the conspiracy that JULIO ALVAREZ, CHRISTOPHER CAMPOS and GEURIS RAMOS, the defendants, and others known and unknown, willfully and knowingly would and did execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

COUNT TWO
(Bank Fraud)

The Grand Jury further charges:

4. From in or about October 2012 up to and including in or about September 2013, in the Southern District of New York and elsewhere, JULIO ALVAREZ, CHRISTOPHER CAMPOS and GEURIS RAMOS, the defendants, willfully and knowingly did execute, and attempt to execute, a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations and promises, to wit, ALVAREZ, CAMPOS and RAMOS submitted fraudulent applications for loans on behalf of consumers to financial institutions, including banks insured by the Federal Deposit Insurance Corporation, in connection with automobile purchases by individuals ALVAREZ, CAMPOS and RAMOS knew to be straw buyers of these automobiles.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT THREE
(Wire Fraud)

The Grand Jury further charges:

5. From in or about October 2012 up to and including in or about September 2013, in the Southern District of New York and elsewhere, JULIO ALVAREZ, CHRISTOPHER CAMPOS and GEURIS RAMOS, the defendants, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, ALVAREZ, CAMPOS, and RAMOS submitted fraudulent applications for loans to financial institutions in connection with automobile purchases by individuals ALVAREZ, CAMPOS, and RAMOS knew to be straw buyers of these automobiles, and in furtherance thereof, ALVAREZ, CAMPOS, and RAMOS transmitted and caused to be transmitted interstate telephone calls, emails and wire transfers of funds.

(Title 18, United States Code, Sections 1343 and 2.)

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FORFEITURE ALLEGATION

6. As a result of committing the offenses alleged in Counts One, Two, and Three of this Indictment, JULIO ALVAREZ, CHRISTOPHER CAMPOS and GEURIS RAMOS, the defendants, shall forfeit to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(2)(A) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses.

SUBSTITUTE ASSET PROVISION

7. If any of the above described forfeitable property, as a result of any act or omission of the defendants:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;


(c) has been placed beyond the jurisdiction of the Court;


(d) has been substantially diminished in value;
or

(e) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture

of any other property of the defendants up to the value of the
above forfeitable property.

(Title 18, United States Code, Section 982 and Title 18,
United States Code, Sections 1343, 1344 and 1349.)



FOREPERSON

PREET BHARARA
United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

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INDICTMENT

16 Cr. ____

(18 U.S.C. §§ 1343, 1344, 1349, and 2.)

Ng.
Frederick

PREET BHARARA
United States Attorney.

6/7/16
ac

- Filed Indictment
Case assigned to J Torres
J Peak
JESMA